

**Discovery Steering Committee
In re Google Digital Advertising Antitrust Litigation**

October 24, 2023

VIA ECF

Hon. P. Kevin Castel
Daniel Patrick Moynihan
United States Courthouse
500 Pearl St.
New York, NY 10007-1312

In re Google Digital Advertising Antitrust Litigation
No. 1:21-md-03010 (PKC)

Dear Judge Castel:

We write to correct an inadvertent error in our letter of Friday, October 20, 2023, concerning search terms and custodians in the above captioned matter (“Plaintiffs’ Letter”). (Doc. 654.) No conference is currently scheduled.

Page four of Plaintiffs’ Letter states that the 10 search terms that Plaintiffs maintain Google should run result in approximately 498,000 hits before deduplication. It has since come to our attention that the actual number of pre-deduplication hits for these terms is approximately 642,000—the total of the hits set forth in Appendix A to Plaintiffs’ Letter. The subsequent statement in Plaintiffs’ Letter—that approximately 430,000 of these hits derive from four search terms relating to the names of Plaintiffs and their affiliates—is accurate.

We apologize for this error.

Respectfully,

/s/ Jordan Elias
Jordan Elias
Girard Sharp LLP

/s/ Philip Korologos
Philip Korologos
Boies Schiller Flexner LLP

/s/ Zeke DeRose
Zeke DeRose
The Lanier Law Firm, PC

/s/ Noah Heinz
Noah Heinz
Keller Postman LLC

/s/ Serina Vash
Serina Vash
Herman Jones LLP

Copies to all counsel via ECF.